

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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Attorney for the debtor

In Re:

James and Elaine Leshner

Case Number: 19-21382

Hearing Date: November 26, 2019 at 11:00
a.m.

Judge: ANDREW B. ALTENBURG

Chapter: 13

Recommended Local Form:

☒ Followed

☐ Modified

**CERTIFICATION IN SUPPORT OF OBJECTION TO ORDER TO SHOW CAUSE WHY
SANCTIONS SHOULD NOT BE IMPOSED**

Mark W. Ford, Esquire of full age, does hereby certify and state:

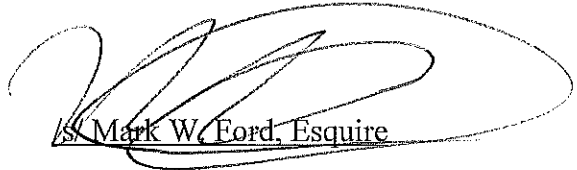
1. I am the attorney for the debtors in the above matter and as such, I have personal knowledge of the facts stated herein:
2. A couple of months ago, I was contacted by my client, Elaine Leshner who was upset that several alleged creditors had been included and named in the Bankruptcy even though she did not believe any money was owed to them.
3. She requested their proofs of claims be objected to.
4. I assigned my bankruptcy paralegal to draft the motion to object to the Proofs of claims.
5. I handed my paralegal a printout of Proofs of claims that were circled by and provided by my client asking us to object to their proofs of claims. My paralegal assumed that those 4 circled claims were the proofs of claims filed in the bankruptcy and the ones we were objecting to

because they were circled by the debtor

6. After she drafted them, I reviewed the motion before signing off on it and having it filed with the court.
7. After it was denied, I contacted my client, Elaine Leshner again and requested proofs that the
8. accounts were paid. She was still firmly convinced that the claims have been paid and I asked her to forward me proofs of payment.
9. She has since responded by sending a summary of what she claims is owed and not owed And that the source of her information was the credit report.
- 10 I admit that I should have more carefully investigated her claims before filing.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 19, 2019



/s/ Mark W. Ford, Esquire